

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ALLEN BELL a/k/a ALLEN WALKER,

NOTICE OF MOTION

Plaintiffs,

19 Civ. 5868 (NRB)

-against-

CITY OF NEW YORK, individually and in their official
capacity as New York City police officers JACLYN
RODNEY, HELIN MARTE and JOHN or JANE DOE 1-
10,

Defendants.

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PLEASE TAKE NOTICE that upon the Declaration of Laura Iheanachor, dated April 2, 2021, and the exhibits annexed thereto and the accompanying memorandum of law, dated April 2, 2021, and all pleadings and proceedings previously had herein, defendants City of New York, Police Officer Jaclyn Rodney, and Police Officer Helin Marte will move this Court before the Honorable Naomi Reice Buchwald, United States District Judge, at the United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, New York, 10007, at a time and date to be determined by the Court, to grant summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure, and for such other and further relief as the Court deems just, proper and equitable.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, are to be served by May 10, 2021; and

PLEASE TAKE FURTHER NOTICE that reply papers, if any, are to be served
by May 24, 2021.

Dated: New York, New York
April 2, 2021

JAMES E. JOHNSON
Corporation Counsel of the City of New York
*Attorney for Defendants City of New York, Rodney,
and Marte*
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By: *Laura Iheanachor* /s/
Laura Iheanachor
Assistant Corporation Counsel

To: All Counsel of Record (Via ECF)